


Record/FILE ON DEMAND

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

FILED	RECEIVED
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COUNSEL/PARTIES OF RECORD	
<div style="border: 1px solid black; padding: 5px; display: inline-block;"> <b>APR 29 2024</b> </div>	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: 	DEPUTY

Nelson L. Bruce,

Plaintiff(s),

vs.

REV FEDERAL CREDIT UNION, TRANS  
UNION, LLC, et al.

Defendant(s).

**CASE NO.: 2:22-cv-01292-BHH-MGB**

**PLAINTIFF'S MOTION TO COMPEL  
DISCOVERY FROM NON-PARTIES  
TELUS INTERNATIONAL (U.S.) CORP.  
WHO WAS SERVED A SUBPOENA  
BY THE PLAINTIFF**

Plaintiff **Nelson L. Bruce**, hereby moves this court for an order compelling Non-Party TELUS International (U.S.) Corp. to produce documents related to Subpoenas. Plaintiff originally filed this motion in the U.S. Court for the district of South Carolina on 2-28-2024 in case no. 22-cv-01292-BHH-MGB. See...ECF No. 150. The motion was denied because plaintiff filed his motion to compel in the wrong jurisdiction. See...ECF No. 162. Plaintiff filed a motion for an extension of time to file the motions to compel in the proper jurisdiction where the court granted plaintiff's motion and extended the time ordering plaintiff to file a status report by April 29, 2024. See...ECF No. 167 and 168.

**REQUEST TO COMPEL DISCOVERY FROM TELUS International (U.S.) Corp.**

On or about 11-30-2023, Plaintiff filed a motion requesting for subpoenas to be issued to non-party, TELUS International (U.S.) Corp. ("Telus"), See...ECF No. 95. On 12-1-2023, this court granted plaintiff's Motion for Issuance of Subpoena and directed the Clerk of Court to issue the subpoenas and mailed out the subpoenas to plaintiff (See...ECF No. 96). On 12-7-2023, non-party Telus was served via the United States Postal Service signature confirmation with plaintiff's subpoena (see...Exhibit 7). As of the date of this filing, plaintiff has not received any responses

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent by

U.S.P.S. Priority Mail to the party listed below:

**SENT TO:**

TELUS International (U.S.) Corp.  
Attention: Legal Department  
2251 South Decatur Boulevard  
Las Vegas, NV 89102  
Priority Mail No.: 9405 5036 9930 0682 2690 46

Date this 24<sup>th</sup> day of **April, 2024**.

“Without Prejudice”



Nelson L. Bruce, Propria Persona, Sui Juris  
“All Natural Rights Explicitly Reserved and Retained”  
c/o P.O. Box 3345, Summerville, South Carolina 29484  
Phone: 843-437-7901  
Email: leonbruce81@yahoo.com

from Telus. Plaintiff has Googled Telus and have been unsuccessful in reaching them by phone. Telus has had plenty of time to respond and appears to have refused to and therefore plaintiff requests for an order compelling Telus to respond to plaintiff's subpoena and produce the documents of information requested and if this court deems fit, sanctions against Telus.

**WHEREFORE**, since Telus refuses to comply with plaintiff's discovery requests, Plaintiff respectfully moves this court for an order to compel this non-parties to comply with plaintiff's subpoena within 10 calendar days from the courts order so that plaintiff has the opportunity to complete discovery without any further delays. Should this court find that this non-parties failure to comply was in bad faith that this court issue sanctions against the non-party.

**Certification of Plaintiff:**

I Nelson L. Bruce hereby certify that I have in good faith conferred or attempted to confer with this party for discovery as presented above in an effort to obtain it without court action. Date this 24<sup>th</sup> day of **April, 2024**.

**RESPECTFULLY PRESENTED,**

"Without Prejudice"



Nelson L. Bruce, Propria Persona, Sui Juris  
"All Natural Rights Explicitly Reserved and Retained"  
c/o P.O. Box 3345, Summerville, South Carolina 29484  
Phone: 843-437-7901  
Email: leonbruce81@yahoo.com

## **EXHIBIT - 7**

EI 597 357 278 US



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

Nelson L. Bruce,

Plaintiff(s),

vs.

REV FEDERAL CREDIT UNION, TRANS  
UNION, LLC, et al.

Defendant(s).

CASE NO.: 2:22-cv-01292-BHH-MGB

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Subpoena issued to  
TELUS International (U.S.) Corp. has been mailed to TELUS International (U.S.) Corp. via the:  
UNITED STATES POST OFFICE via the UNITED STATES POSTAL SERVICE by Priority  
Mail Express Signature Required. Dated this 4th day of December, 2023.

**SENT TO:**

TELUS International (U.S.) Corp.  
Attention: Legal Department  
2251 South Decatur Boulevard  
Las Vegas, NV 89102  
Priority Mail Express No.: EI 597 357 278 US

"Without Prejudice"

*Nelson L. Bruce*

Nelson L. Bruce, Propria Persona, Sui Juris  
"All Natural Rights Explicitly Reserved and Retained"  
c/o P.O. Box 3345, Summerville, South Carolina 29484  
Phone: 843-437-7901  
Email: leonbruce81@yahoo.com



December 7, 2023

Dear Nelson Bruce:

The following is in response to your request for proof of delivery on your item with the tracking number:  
**EI59 7357 278U S.**

#### Item Details

**Status:** Delivered, Left with Individual  
**Status Date / Time:** December 7, 2023, 1:23 pm  
**Location:** LAS VEGAS, NV 89102  
**Postal Product:** Priority Mail Express 1-Day®  
**Extra Services:** PO to Addressee  
 Up to \$100 insurance included  
**Actual Recipient Name:** K ROBINSON

Note: Actual Recipient Name may vary if the intended recipient is not available at the time of delivery.

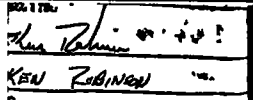
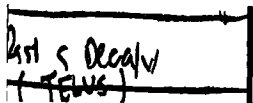
#### Shipment Details

**Weight:** 3.0oz

#### Destination Delivery Address

**Street Address:** 2251 S DECATUR BLVD  
**City, State ZIP Code:** LAS VEGAS, NV 89102-8586

#### Recipient Signature

Signature of Recipient:	
Address of Recipient:	

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely,  
 United States Postal Service®  
 475 L'Enfant Plaza SW  
 Washington, D.C. 20260-0004